

Red Hill Sept 10 Principals' call Talking Points
Draft 09-09-2021

Numbered bullets = agenda items in new proposed order
Lettered bullets = talking points

- 1) May 6th Update
 - a) DOH has issued another request for information to the Navy. (DOH will get this out before Sept 10th this week and will ask for a 14-day turnaround. The letter will likely say that if the Navy doesn't produce requested information, DOH will be issuing penalties)
 - b) Regulators need preliminary investigation information now. Any further delays are unacceptable. Tell us the investigation findings to date in detail.
 - c) This will come up at FTAC and EPA/DOH doesn't want to be in a position to state we don't have information or haven't had adequate time to process. We don't want to hear about it at the FTAC with everyone else.
- 2) Tank Upgrade Alternative & Release Detection Supplemental was submitted on 23 Aug 2021
 - a) Positives:
 - i) Document is an improvement from the first submission. Recognize a lot of work was put into the report.
 - ii) Considerable work has been done since the AOC was established to improve the facility and operations. TUA Supplemental helps communicate all the work that technical teams have done under the AOC.
 - iii) We appreciate that the end goal is secondary containment or defuel.
 - b) Issues:
 - i) We were hoping for a more robust analysis for why alternatives aren't feasible
 - ii) Lack of information sharing about the May 6th release and the GTTNA study impact credibility of the statements made in the TUA Supplemental that are not supported by evidence and documented analysis.
 - (1) (for example: system of systems would have prevented the 2014 release; committed to secondary containment by 2045 without a clear plan or clear discussion on what the commitment means).
 - iii) Lack of information sharing is delaying progress. Regulators can make decisions more quickly when we are kept informed of Navy/DLA's plans throughout the process.
 - iv) We need clarity on the plan for secondary containment and the related implications for the technical work and BAPT review process as defined under the AOC.
 - v) Use of Navy conclusions from other AOC sections to support the TUA 1A selection is not appropriate if regulators have on record comments disagreeing with some of these lines of evidence. Examples include referring to Navy holding capacity model and natural source zone depletion conclusions and GWFM capture zone conclusions. Further, these lines of evidence, if valid, would support other TUA options as well.
- 3) AOC Party Meeting on Sept 14: TUA Supplemental
 - a) 14 questions have been submitted to the Red Hill PMO. Thanks to Red Hill PMO and others for coordinating Navy and DLA participation so we can have a productive meeting.

Big picture:

1. What is the basis and rationale for the 2045 target date for secondary containment?
2. Would the Navy consider integrating the commitment to secondary containment into the AOC?
3. Can the Navy briefly describe how each option scores against each criterion for BAPT?
4. 1A BAPT rationale focused on other five options being infeasible due to engineering challenges. How would these same engineering challenges be overcome by a future secondary containment option?
5. If a future secondary containment option is not selected, when will the Navy be developing a contingency plan for defueling by 2045?
6. Could the Navy provide a high-level, incremental schedule at five-year intervals from now to 2045 that describes plans for TIRM, TUA, release identification and enhanced release response capabilities, secondary containment, and potential defueling?
7. Given the Navy's commitment to secondary containment or defueling by 2045, what is the schedule and strategy for designing and implementing a Red Hill Shaft water treatment and other active fuel removal and containment infrastructure improvements?

Technical:

1. What is the expected operating life of the tanks with 1A and other options?
2. Which tanks does this TUA 1A proposal apply to?
3. If 1A is approved, how would the current TIRM process change?
4. Why has the TIRM maintenance program taken longer than the originally proposed 2017 TIRM schedule? Can regulators expect the TIRM schedule presented in the TUA Supplemental to be firm?
5. Describe the protocol for responding to each combination of alarms (for example, SVM and AFE alarms sound) within the system of systems? Does the Navy conduct audits that operators are unaware of to test operator response?
6. What are the criteria to evaluate the performance of tank coatings proposed in 1B (i.e. pressure, hole size, etc)?
7. How will the Navy integrate lessons learned from releases or other incidents into improvements to facility and operations? While TIRM is designed to address tanks, how does the Navy inspect and maintain other features of the UST system?

4) Hotel Pier

5) Section 5.4 Execution Plan Annex was submitted on 18 Aug 2021

- a) EPA/DOH are working through the Execution Plan and we may request a meeting with NAVFAC to discuss the Execution Plan. EPA/DOH Red Hill Coordinators will be in touch.

6) Section 8 RVA Phase 2 SOW pending letter

- a) EPA and DOH submitted the Notice of Deficiencies on September 2, 2021
- b) In the letter, we invite Navy and DLA to meet with EPA and DOH to discuss contents of the letter.

7) Next Meeting, Friday Oct 1st @ 0900

8) Open